

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

UNITED STATES
PLAINTIFF

V.
MOHAMED IBRAHIM AHMED
DEFENDANT

CR NO.1:17-CR-151

RECEIVED: 10/29/19
U.S. DISTRICT COURT
EASTERN DISTRICT COURT
DAVID A. O'TOOLE, CLERK

MOTION TO REPLACE COUNSEL WITH
ADEQUATE LEGAL REPRESENTATION

Comes now, Mohamed Ahmed, defendant in the above captioned cause, and he moves the court to replace his current woefully ineffective attorney and co-counsel with legal assistance from a lawyer who is ready and willing to assist me in this instant case. In support thereof I show the court the following:

1) Defendants current court appointed attorney(s) Gerardo Montalvo, and, co-counsel, David Adler, rather than assist me with the dismissal of my false charges, are instead encouraging me to accept a 10-year sentence plea of guilt.

2) As officers of the court whose first duty is to the court and not to their client, (to me), Montalvo and Adler have filed nary a motion in the instant case to dismiss obviously false charges.

3) Montalvo and Adler have failed to file a motion with the court for dismissal of all charges for lack of subject matter jurisdiction as no affidavit of criminal complaint, sworn to by a competent witness before a judicial officer, during a probable cause hearing, has been placed into the record of the court.

4) It is this sworn affidavit of a criminal complaint by a harmed or injured party which forms the sole basis for the courts subject matter jurisdiction.

5) The information in this case is nothing more than mere uncorroborated fantastical imagings of known FBI covering confidential informants

fantastical imagings of known self-serving confidential informants looking for a sentence reduction of his own criminality.

6) The informantion filed by U.S. attorneys contain no competent injured or harmed party filing a affidavit against me. It is merely outrageous ridiculous allegations of various codes I violated without bothering to swear that I am subject to them, and thus liable for their breech.

7) Absent no criminal affidavit os an injured or harmed party I have been charged with no crime so the instant proceedings can not possibly be criminal in nature.

8) As I have informed my attorneys of record via letter, Federal Rules of Civil Procedures, Rule 2, states there is only one form of action i.e., civil action, meaning contracts are some how involved in the instant matter.

9) As I have repeatedly stated in my outgoing legal correspondance I have entered into no valid contractual agreement, with full disclosure, knowingly/ intentionally/ willingly, with the United States.

10) I am not a "person" as this legal term is used to designate corporations and other legal fictions.

11) I am a living man, named Mohamed Ibrahim Ahmed.

12) I am not a U.S. citizen.

13) I am ^{Not} surety/ accomdaction party for the legal fiction MOHAMED IBRAHIM AHMED (all upper case en legis) named in all the legal documents issued by the U.S. attorneys in this case.

14) I possess inalienable rights, immunities, and privileges which I can not waive nor can they be abrogated by misapplication of various codes and rules and statutes under color of federal law.

15) These inalienable rights include my private, common law and constitutionally protected rights which I invoke and assert.

16) My court appointed attorney(s) have refused to work and concert with me, to investigate the baseless commercial charges against me, to plan defenses, to challenge the courts subject matter jurisdiction.

17) Rather than assist me in squashing the baseless commercial charges against me, my attorneys have taken up the battle of proving me guilty by coaxing me into pleading out to 10-year prison sentence, that is, my attorney is performing the duties of the U.S. attorneys office.

18) The baseless charges in my Information need not be proven by the U.S. attorneys because lawyers coax and cajole and threaten their "clients" into pleading guilty to them.

19) What a sordid state of affairs exist when lawyers pervert justice via their cooperation with the government attorneys by joining themselves to my false accusers.

20) For nearly two years my current court appointed attorney, whose first duty is to the court, not to me, have cooperated, in full, with their U.S. attorney brethren, and they have made it an impossibility for me to successfully defend myself in this case.

21) My baseless charges should have been squashed years ago, as clearly The Court and The U.S. Attorneys Office lack subject matter jurisdiction.

22) I long ago lost all trust and confidence in my current court-appointed attorneys who are working hand and glove with the U.S. Attorneys against me, and whom I consider worst than the U.S. attorneys.

23) I ask the court to replace my current do- nothing, traitorous "officers of the court" with someone I can trust to provide me with adequate legal representation.

cc:cc: -PRAYER-

Wherefore, premises considering, defendant prays the honorable court grant this motion to replace counsel with adequate legal representation for the above stated reasons and appoint replacement attorney who will provide defendant with competent adequate legal representation.

Signed this 21ST day of October 2019

A handwritten signature in cursive script, reading "Mohamed Ibrahim Ahmed", is written over a horizontal line.

Mohamed Ibrahim Ahmed

in the United States District Court
for the Eastern District of Texas

UNITED STATES
Plaintiff

CR No. 1:17-CR-151

v.

Mohamed Ibrahim Ahmed
Defendant

ORDER

This court, after careful review of the defendants motion for replacement of counsel, hereby:

GRANTS

DENY(ies)

said motion of this _____ day of _____ 2019.

Honorable Judge

October 22, 2019

RE: United States v. Mohamed Ibrahim Ahmed
CR # 1:17 - CR -151

Dear District Clerk,

Please find enclosed the ~~following~~ ~~motion~~ Motion
To Replace Counsel and place it with my
other legal documents in the above captioned
cause.

Please set a Hearing date @ your earliest
possible convenience as my trial is scheduled
for December and my Attorney-of-record
is trying to force me into pleading guilty
to false Charges by threatening me with
a Life sentence rather than put up a viable
defense.

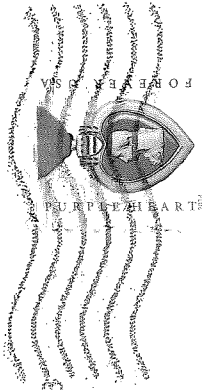
Thanking you, in advance, I remain,

Sincerely,

MOHAMED AHMED

cc: file copy

Name: MOHAMED IBRAHIM AHMED NORTH HOUSTON TX 773
Register Number: 91506-054 6-WEST
Federal Detention Center Houston
P.O. Box 526255
Houston, TX 77052



MARCIA A. CRONE

UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT

UNITED STATES COURT HOUSE

300 WILLOW STREET TEXAS 77701

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